



GAINOR & DONNER

3250 Mary Street
Suite 405
Miami, Florida 33131
O. [305.537-2000](tel:305.537.2000)
F. [305.537-2001](tel:305.537.2001)
C. [305.206.2008](tel:305.206.2008)
Gainorlaw@gmail.com
adonner@gainorlaw.org

April 2, 2024

Granted.
So ordered
4/3/2025

BYECF

The Honorable J. Paul Oetken
United States District Court Judge
Southern District of New York
40 Foley Square
New York, New York 10007



J. PAUL OETKEN
United States District Judge

Re: *United States v. John Costanzo Jr. and Manuel Recio*, 22 Cr. 281 (JPO)

Dear Judge Oetken:

This letter is respectfully submitted on behalf of defendant Manuel Recio requesting leave to file under seal Exhibits A-F to his recently filed Reply to Government's Opposition to the Defendants' Post-Trial Motions. [D.E. 230]. Mr. Recio makes this request pursuant to your prior rulings regarding these materials that you previously ordered to be filed under a sealing restriction. Unredacted versions of these exhibits will be sent to all parties via email on April 2, 2024.

In accordance with Rule 8E of Your Honor's Individual Practices in Criminal Cases, Local Civil Rule 5.2 and the Southern District of New York's ECF Privacy Policy, Mr. Recio requests permission to file under seal Exhibits A-F to his recently filed Reply to Government's Opposition to the Defendants' Post-Trial Motions under a Level 2 Sealing Restriction, Selected Parties.

Dated: April 02, 2024
New York, New York

Respectfully submitted,
s/ Amber Donner
Gainor & Donner
3250 Mary Street
Suite 405

Miami, Florida 33133
Email: gainorlaw.com
Counsel for Manuel Recio

cc Via ECF: all counsel